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9
10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 IN RE: CATHODE RAY TUBE (CRT)
13 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST

MDL No. 1917

14 This Document Relates to:

15 *Sears, Roebuck and Co. and Kmart Corp. v.*
16 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
17 05514

**DECLARATION OF CATHLEEN H.
HARTGE IN SUPPORT OF DEFENDANT
LG ELECTRONICS, INC.'S MOTION
FOR BIFURCATION AND BENCH
TRIAL**

[SEALED EXHIBITS C & D]

Judge: Honorable Jon S. Tigar
Date: September 22, 2016
Time: 2:00 p.m.
Courtroom: 9, 19th Floor

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28 MDL No. 1917

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**DECLARATION OF CATHLEEN HARTGE IN SUPPORT OF DEFENDANT LG ELECTRONICS, INC.'S
MOTION FOR BIFURCATION AND BENCH TRIAL [SEALED EXHIBITS C & D]**

1 I, Cathleen H. Hartge, hereby declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of
3 record for Defendant LG Electronics, Inc. ("LGE"), in the above entitled action. I am licensed
4 to practice law in the State of California. I make this declaration based on my personal
5 knowledge and, if called upon as a witness, could and would testify competently as to the
6 matters set forth below.

7 2. Attached to this declaration as Exhibit A is a true and correct copy of the
8 Supplemental Attachment A to Certain Direct Action Plaintiffs' Responses to Various
9 Interrogatories, September 5, 2014.

10 3. Attached to this declaration as Exhibit B is a true and correct copy of excerpts
11 from the April 15, 2014 Expert Report of Vandy Howell, Ph.D.

12 4. Attached to this declaration as Exhibit C is a true and correct copy of excerpts
13 from the April 15, 2014 Expert Report of Alan S. Frankel, Ph.D., prepared on behalf of
14 Sears/Kmart.

15 5. Attached to this declaration as Exhibit D is a true and correct copy of excerpts
16 from the September 25, 2014 Expert Report of Alan S. Frankel, Ph.D., prepared on behalf of
17 Sears/Kmart.

18 6. Attached to this declaration as Exhibit E is a true and correct copy of excerpts of
19 the July 13, 2012 Deposition of Takashi Nakano.

20 7. Attached to this declaration as Exhibit F is a true and correct copy of excerpts of
21 the October 9, 2014 30(b)(6) Deposition of Robert L. Nowicki.

22 8. Attached to this declaration as Exhibit G is a true and correct copy of excerpts of
23 the November 4, 2014 30(b)(6) Deposition of Patrick Barrett.

24 9. Attached to this declaration as Exhibit H is a true and correct copy of excerpts of
25 the November 17, 2015 Deposition of Wayne Park.

26 10. Attached to this declaration as Exhibit I is a true and correct copy of the
27 Judgment in a Civil Case, *Costco Wholesale Corp. v. AU Optronics Corp.*, No. C13-1207RAJ
28 (W.D. Wash. June 4, 2016), ECF No. 682.

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1 I declare under penalty of perjury under the laws of California that the foregoing is true
2 and correct.

3 Executed on the 12th day of August 2016 in San Francisco, California.

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5 /s/ Cathleen Hartge
6 CATHLEEN HARTGE
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